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51 **UNITED STATES DISTRICT COURT
52 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

53 CHASOM BROWN, MONIQUE
54 TRUJILLO, WILLIAM BYATT, JEREMY
55 DAVIS, and CHRISTOPHER CASTILLO,
56 individually and on behalf of all similarly
57 situated,

58 Plaintiffs,

59 v.

60 GOOGLE LLC,

61 Defendant.

62 Case No. 4:20-cv-03664-YGR-SVK

63 **JOINT STIPULATION AND [PROPOSED]
64 ORDER EXTENDING TIME FOR
65 GOOGLE TO SUBMIT DECLARATION
66 IN SUPPORT OF PLAINTIFFS'
67 ADMINISTRATIVE MOTION TO
68 CONSIDER WHETHER PORTIONS OF
69 PLAINTIFFS' RENEWED REQUEST TO
70 DEPOSE SUNDAR PICHAI SHOULD BE
71 SEALED (DKT. 634)**

72 The Honorable Susan van Keulen

73 Case No. 4:20-cv-03664-YGR-SVK

74 **JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO
75 SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 634)**

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on July 21, 2022, Plaintiffs filed their Administrative Motion to Consider
4 Whether Portions of Plaintiffs’ Renewed Request to Depose Google CEO Sundar Pichai Should Be
5 Sealed (“Motion to Seal”) (Dkt. 634);

6 WHEREAS, on July 21, 2022, Google received unredacted copies of Plaintiffs’ Motion to
7 Seal and exhibits cited in Dkt. 635;

8 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the
9 Designating Party to portions of Plaintiffs’ Motion to Seal (Dkt. 634), to establish that such
10 designated material is sealable, is Thursday, July 28, 2022;

11 WHEREAS, Google has requested and Plaintiffs do not oppose an extension of time of 14
12 days to Thursday, August 11, 2022, which Google has represented will provide it with sufficient
13 time to submit its declaration in support of its designated materials in the filings (Dkt. 634);

14 NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall
15 submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 634), to Thursday, August 11,
16 2022.

17 DATED: July 26, 2022
18

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72 *Attorneys for Plaintiffs*

1 **ATTESTATION OF CONCURRENCE**

2 I am the ECF user whose ID and password are being used to file this JOINT STIPULATION
3 AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION
4 IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER
5 PORTIONS OF PLAINTIFFS' RENEWED REQUEST TO DEPOSE SUNDAR PICHAI
6 SHOULD BE SEALED (DKT. 634). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of
7 the signatories identified above has concurred in the filing of this document

8

9 Dated: July 26, 2022

By /s/ Andrew H. Schapiro

10 Andrew H. Schapiro

11 *Counsel on behalf of Google*

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[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS**:

3 The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative
4 Motion to Consider Whether Portions of Plaintiffs' Renewed Request to Depose Google CEO
5 Sundar Pichai Should Be Sealed (Dkt. 634), shall be extended to August 11, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 27, 2022

Susan van Keulen
HON. SUSAN VAN KEULEN
United States Magistrate Judge